

George C. Summerfield (#P40644)
K&L GATES LLP
70 West Madison Street
Suite 3300
Chicago, Illinois 60602
Tel.: +1 (312) 807-4376
Fax: +1 (312) 827-8000
george.summerfield@klgates.com

*Attorneys for Petitioner
CPC Patent Technologies PTY Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In The Matter of an *ex parte* Petition
for Judicial Assistance Pursuant to 28
U.S.C. § 1782, by

CPC Patent Technologies PTY Ltd.,
Petitioner,

In support of legal proceedings in the
Federal Republic of Germany

Case No. 5:21-mc-80091

**CPC PATENT TECHNOLOGIES PTY
LTD.'S PETITION FOR AN *EX
PARTE* DISCOVERY ASSISTANCE
ORDER PURSUANT TO 28 U.S.C. §
1782(a)**

1 Petitioner, CPC Patent Technologies PTY Ltd. (“CPC”) submits this Petition
2 for an *Ex Parte* Order authorizing it to obtain discovery from Apple, Inc. (“Apple”)
3 for use in contemplated patent infringement proceedings in the Federal Republic of
4 Germany (“the Foreign Proceedings”) pursuant to 28 U.S.C. § 1782(a).
5 Specifically, CPC seeks an Order allowing it to serve a subpoena *duces tecum* for the
6 documents identified in Exhibit A, to the accompanying Memorandum in Support of
7 this Petition, to support the Foreign Proceedings. A proposed Order accompanies this
8 Petition.

9
10
11
12
13 Dated: April 22, 2021

Respectfully submitted,

14 By: /s/ George C. Summerfield

15 George C. Summerfield (#P40644)
16 K&L Gates LLP
17 70 West Madison Street, Suite 3300
18 Chicago, Illinois 60602
19 Tel.: +1 (312) 807-4376
20 Fax: +1 (312) 827-8000
21 george.summerfield@klgates.com

22 *Attorneys for Petitioner*
23 *CPC Patent Technologies PTY Ltd.*
24
25
26
27
28